

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor Toni Hardesty, Director

September 2, 2004

Certified Mail No. 7000 1670 0013 8128 4736

Fred Hutchison Director, EHS University of Idaho 1108 W. Sixth St. Moscow, ID 83844-2030

RE:

Facility ID No. 057-00025, University of Idaho, Moscow

Tier I Operating Permit Administrative Amendment No. T1-040207

Dear Mr. Hutchison:

The Department of Environmental Quality (DEQ) is issuing amended Tier I Operating Permit No. T1-040207 for the University of Idaho in accordance with IDAPA 58.01.01.381, Rules for the Control of Air Pollution in Idaho. This permit has been administratively amended by DEQ as requested in your August 2, 2004 letter and is effective as of September 2, 2004.

The following permit conditions have been administratively changed and all other permit conditions remain unchanged:

- The responsible official name was changed to be Jay D. Kenton;
- Permit Condition 1.1 was changed to describe the purpose for this administrative amendment.
- Permit Condition 1.2 was added to clearly specify which previously issued permits are superseded by this permit.
- General Provisions 21.3.2 and 21.3.3 were changed to incorporate the February 5, 2004 change to IDAPA 58.01.01.322.11 regarding periodic compliance certifications. This rule change may be reviewed at the following website: http://www2.state.id.us/adm/adminrules/rules/idapa58/0101.pdf
- General Provisions 21.1 and 24 were changed to specify the reporting periods for annual compliance certifications and for semiannual monitoring reports.

Please be aware this permit replaces Tier I Operating Permit No. T1-020208, dated July 28, 2003, the terms and conditions of which shall no longer be in effect.

University of Idaho Tier I, Administrative Amendment, September 2, 2004 Page 2

If you have questions regarding the amendment procedure or this notification, please contact Dan Pitman, Regional Permit Coordinator at (208) 373-0500 dpitman@deq.state.id.us.

Sincerely,

Martin Bauer, Administrator

Air Quality Division

Martin Ba

MB/KH/sd

Permit No. TI-040207

Enclosure

¢:

Jay D. Kenton, University of Idaho Hudson Mann, Lewiston Regional Office Laurie Kral, EPA Region 10 University of Idaho Tier I, Administrative Amendment, September 2, 2004 Page 3

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bc: Ken Hanna, Permit Writer

Dan Pitman, Permit Coordinator Sherry Davis, Air Quality Division Marilyn Seymore, Pat Rayne, AFS Phyllis Heitman, (Ltr Only) Reading File, Ltr Only)



Air Quality TIER I OPERATING PERMIT

State of Idaho **Department of Environmental Quality**

PERMIT NO. T1-040207

AIRS Facility No. 057-00025

AQCR: 62

CLASS:

A

SIC:

8221 ZONE:

11

UTM COORDINATE (km): 499, 0, 5175.0

| | | ************** |
|----|------|----------------|
| 3 | DEDA | ATTTEE |
| ŧ. | | |

University of Idaho

2. PROJECT

Tier I operating permit (Amended)

| 3. MAILING ADDRESS | CITY | STATE | ZIP |
|--|----------------------------|----------------|------------|
| 1108 W. Sixth St. | Moscow | ID | 83844-2030 |
| 4. FACILITY CONTACT | TITLE | TELEPHONE | |
| Fred Hutchison | Director, EHS | (208) 885-6524 | |
| 5. RESPONSIBLE OFFICIAL TITLE Vice President | | TELEPHONE | |
| Jay D. Kenton | Finance and Administration | (208) 885-6174 | |
| 6. EXACT PLANT LOCATION | | COUNTY | |
| West side of the city of Moscow | | Latah | |

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Graduate and post-graduate education and research

8. PERMIT AUTHORITY

This Tier I operating permit is issued pursuant to Idaho Code §39-115 and the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.300-386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality (DEQ) for the permitted source, unless the permittee emits toxic pollutants subject to State-only requirements pursuant to IDAPA 58.01.01.210, and the permittee elects not to incorporate those terms and conditions into this operating permit.

The effective date of this permit is the date of signature by DEQ on the cover page. Please be aware this permit replaces Tier I Operating Permit No. 057-00025, dated November 18, 2002, the terms and conditions of which shall no longer be in effect.

TONI HARDESTY, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED:

September 2, 2004

DATE EXPIRES November 18, 2007

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Acronyms, Units, and Chemical Nomenclature

AQCR Air Quality Control Region

ASTM American Society of Testing and Materials

CFR Code of Federal Regulations

CO carbon monoxide

COMS continuous opacity monitoring system
DEO Department of Environmental Quality

dscf dry standard cubic feet

EPA U.S. Environmental Protection Agency

gr grain

gr/dscf grains per dry standard cubic foot

IDAPA A numbering designation for all administrative rules in Idaho promulgated in accordance

with the Idaho Administrative Procedures Act

km kilometer lb pound(s)

lb/hr pound per hour

MMBtu/hr million British thermal units per hour

MMGal/day million gallons per day

NO_X nitrogen oxides

NSPS New Source Performance Standards

O&M operations and maintenance

PM particulate matter

PM₁₀ particulate matter with an aerodynamic diameter less than or equal to a nominal 10

micrometers or less

SIC Standard Industrial Classification

SIP State Implementation Plan

 SO_2 sulfur dioxide SO_X oxides of sulfur T/yr tons per year

U.S.C. United States Code

UTM Universal Transverse Mercator
VOC volatile organic compound

Permittee: Location: University of Idaho Moscow, Idaho Facility ID No. 057-00025

Date Issued: Date Expires: September 2, 2004 November 18, 2007

1. TIER I OPERATING PERMIT SCOPE

Purpose

1.1 This Tier I operating permit establishes facility-wide requirements in accordance with the State Implementation Plan (SIP) control strategy and the Rules for the Control of Air Pollution in Idaho. The purpose of this Tier I permit amendment is to change the name of the responsible official.

1.2 This Tier I amendment supersedes the following permit(s):

• Tier I Permit No. T1-020208, issued July 28, 2003

• Tier I Permit No. T1-020208, issued November 18, 2002

9603-154-1

Regulated Sources

1.3 Table 1.1 lists the regulated sources in this Tier I operating permit.

Table 1.1 REGULATED SOURCES

| Permit Sections | Source Description | Emissions Control |
|-----------------|--|--|
| 2 | Facility-wide fugitive dust emissions sources: - Wood-waste boiler ash handling - Wood-waste fuel truck dump - Paved roads and parking lots - Unpaved roads and parking lots | Fugitive emissions — reasonable control of fugitive emissions |
| 3 | Wood-waste-fired boiler: S-B00 - Solid Fuels wood-waste-fired boiler Rated capacity - 60,000 pounds steam per hour | Multiclone unit |
| 4 | Natural gas-fired boilers: S-B0 - Cleaver-Brooks natural gas-fired boiler Model: DLD-76 Rated heat input capacity: 82.5 MMBtu/hr S-B4 - Combustion Engineering natural gas-fired boiler Model: NB-242 Rated heat input capacity: 42.9 MMBtu/hr | S-B0 - Uncontrolled S-B4 - Uncontrolled |
| 5 | Diesel-fired electrical generators: S-G01 - Kohler Model 18 NA 3160 - located at Gibb Hall S-G02 - Kohler Model 180ROZJ181 - located at Power Plant S-G03 - CAT Model 3412 - located at McClure Hall | S-G01 - Uncontrolled S-G02 - Uncontrolled S-G03 - Uncontrolled |
| 6 | Insignificant activities: | As applicable |

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Date Expires:

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2. FACILITY-WIDE REQUIREMENTS

The following table contains a summary of requirements that apply generally to emissions units at the facility:

Table 2.1 FACILITY-WIDE APPLICABLE REQUIREMENTS SUMMARY

| Permit Conditions | Parameter | Permit Limit/ Standard Summary | Applicable Requirements Reference | Monitoring and Recordkeeping Requirements |
|----------------------|--|---|--------------------------------------|---|
| 2.1 | Fugitive emissions | Reasonable control | IDAPA 58.01.01.650-651 | 2.2, 2.3, 2.4, 2.10, 2.11 |
| 2.5 | Odors | Reasonable control | IDAPA 58.01.01.775-776 | 2.6, 2.10, 2.11 |
| 2.7 | Visible emissions | 20% opacity for no more than three minutes in any 60-minute period | IDAPA 58.01.01.625 | 2.8, 2.10, 2.11 |
| 2.9 | Excess emissions | Compliance with IDAPA 58.01.01.130-136 | IDAPA 58.01.01.130-136 | 2.9-2.9.5, 2.10, 2.11 |
| 2.12 | Open burning | Compliance with IDAPA 58.01.01.600-616 | IDAPA 58.01.01.600-616 | 2.10, 2.11 |
| 2.13 | Renovation and demolition | Compliance with 40 CFR 61, Subpart M | 40 CFR 61, Subpart M | 2.10, 2.11 |
| 2.14 | Chemical accident prevention | Compliance with 40 CFR 68 | 40 CFR 68 | 2.10, 2.11 |
| 2.15 | Air quality standards | Test methods | IDAPA 58.01.01.157 | 2.10, 2.11, 2.20 |
| 2.16 | Fuel-burning equipment | Grain loading | IDAPA 58.01.01.676 and 677 | 2.10, 2.11 |
| 2.18 | Fuel sulfur content | ASTM Grade 1 fuel oil — 0.3% by weight; ASTM Grade 2 fuel oil — 0.5% by weight | IDAPA 58.01.01.728 | 2.10, 2.11, 2.19 |
| 2.20 | Criteria air pollutants, opacity | Compliance testing | IDAPA 58.01.01.157 | 2.10, 2.11, 2.15 |
| 2.21 | Recycling and emissions reductions | Compliance with 40 CFR 82, Subpart F | 40 CFR 82, Subpart F | 2.10, 2.11 |

Fugitive Emissions

2.1 All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

Permittee: University of Idaho Facility ID No. Date Issued: September 2, 2004

Location: Moscow, Idaho 057-00025 Date Expires: November 18, 2007

2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable, but no later than 24 hours after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

2.4 The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable but no later than 24 hours after identification. The permittee shall maintain records of the results of each monthly fugitive emission inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Odors

2.5 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable but no later than 24 hours after the receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

Visible Emissions

2.7 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, but no latter than 24 hours, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

Permittee: Uni Location: Mo

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The permittee shall maintain records of the results of each monthly visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94, IDAPA 58.01.01.322.08, 4/5/00]

Excess Emissions

- 2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between Permit Condition 2.9 and the regulations of IDAPA 58.01.01.130-136.
- 2.9.1 The person responsible for or in charge of a facility during an excess emissions event shall, with all practicable speed, but no later than 24 hours after the event, initiate and complete appropriate and reasonable action to correct the conditions causing such excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and shall, as provided below or upon request of DEQ, submit a full report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132, 4/5/00]

2.9.2 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:

[IDAPA 58.01.01.133, 4/5/00]

 A prohibition of any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory or a Wood Stove Curtailment Advisory has been declared by DEQ.

[IDAPA 58.01.01.133.01.a, 3/20/97]

Notifying DEQ of the excess emissions event as soon as reasonably possible, but no later than two
hours prior to the start of the event, unless the owner or operator demonstrates to DEQ's satisfaction
that a shorter advanced notice was necessary.

[IDAPA 58.01.01.133.01.b, 4/5/00]

 The owner or operator of a source of excess emissions shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133.01.c, 3/20/97]

2.9.3 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

[IDAPA 58.01.01.134, 4/5/00]

2.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown

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conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall comply with the following:

[IDAPA 58.01.01.134.02, 4/5/00]

• The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event to minimize the impact of such excess emissions on the ambient air quality and public health.

[IDAPA 58.01.01.134.02.a, 4/5/00]

- The owner or operator shall notify DEQ of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the owner or operator demonstrates to DEQ's satisfaction that the longer reporting period was necessary.
 [IDAPA 58.01.01.134.02.b, 4/5/00]
- The owner or operator shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

[IDAPA 58.01.01.134.02.c, 3/20/97]

- 2.9.3.2 During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by DEQ shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the facility owner or operator.

 [IDAPA 58.01.01.134.03 4/5/00]
- 2.9.4 A written report for each excess emissions event shall be submitted to DEQ by the owner or operator no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

[IDAPA 58.01.01.135.01, 3/20/97; IDAPA 58.01.01.135.02, 4/5/00]

2.9.5 The owner or operator shall maintain excess emissions records at the facility for the most recent five-calendar-year period. The records shall be made available to DEQ upon request. The excess emissions records shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

[IDAPA 58.01.01.136.01, 02, 3/20/97; IDAPA 58.01.01.136.03, 4/5/00]

 An excess emissions record book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to DEQ pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment.

[IDAPA 58.01.01.136.03.a, 4/5/00]

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 Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, and safety preventative maintenance plans that have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136.03.b, 3/20/97; IDAPA 58.01.01.130-136, 4/5/00 (State-only; federally enforceable upon approval into the SIP); IDAPA 58.01.01.322.08.b, 3/23/98]

Reports and Certifications

All periodic reports and certifications required by this permit and General Provision 24 shall be submitted to DEQ within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Reports, certifications, and notifications shall be submitted to the following:

Air Quality Permit Compliance Department of Environmental Quality Lewiston Regional Office 1118 F St. Lewiston, ID 83501

Tel.: (208) 769-4370

Fax: (208) 769-3451

The periodic compliance certification required by General Provision 21 shall also be submitted within 30 days of the end of the specified reporting period to the following:

EPA Region 10 Air Operating Permits, OAQ-107 1200 Sixth Ave. Seattle, WA 98101

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

Monitoring and Recordkeeping

The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.322.07, 5/1/94]

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Open Burning

2.12 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, Rules for Control of Open Burning.

IDAPA 58.01.01.600-616, 5/1/94]

Renovation / Demoiition

2.13 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M, when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

Regulated Substances for Accidental Release Prevention

- 2.14 An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions in 40 CFR 68 no later than the latest of the following dates:
 - Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
 - The date on which a regulated substance is first present above a threshold quantity in a process.

 [40 CFR 68.10 (a)]

Test Methods

2.15 If testing is required, the permittee shall use the test methods listed in Table 2.2 to measure the pollutant emissions.

Table 2.2 EPA REFERENCE TEST METHODS

| Pollutant | Test Method* | Special Conditions |
|------------------|------------------------------------|---|
| PM ₁₀ | EPA Method 201.a EPA Method 202 | |
| PM | EPA Method 5 | |
| NO _x | EPA Method 7 | |
| SO₂ | EPA Method 6 | |
| CO | EPA Method 10 | |
| VOC | EPA Method 25 | |
| Opacity | EPA Method 9 | If an NSPS source, IDAPA 58.01.01.625 and Method 9; otherwise, IDAPA 58.01.01.625 only. |

^{*} Or DEQ-approved alternative in accordance with IDAPA 58.01.01.157

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Fuel-Burning Equipment

2.16 The permittee shall not discharge to the atmosphere from any fuel-burning equipment particulate matter in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

2.17 The permittee is not required to demonstrate compliance with the PM grain-loading standards listed in IDAPA 58.01.01.676 and 677, except for emissions units with permit conditions including compliance demonstration provisions specified elsewhere in this permit.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

Sulfur Content

- 2.18 No person shall sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:
 - ASTM Grade 1 fuel oil 0.3% by weight
 - ASTM Grade 2 fuel oil 0.5% by weight

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

2.19 The permittee shall maintain documentation of the actual sulfur content in percent by weight for each shipment of distillate fuel oil received. The documentation must identify the supplier of the fuel, the date of fuel delivery, the grade of distillate fuel, and the sulfur content in percent by weight.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

Compliance Testing

2.20 If testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any compliance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of test method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

Permittee: Location:

University of Idaho Moscow, Idaho

Facility ID No. 057-00025

Date Issued: **Date Expires:**

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Within 30 days following the date on which a compliance test required by this permit is concluded, the permittee shall submit a report to DEO for the respective test. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the following:

Air Quality Permit Compliance Department of Environmental Quality Lewiston Regional Office 1118 F St.

Lewiston, ID 83501

Tel.: (208) 769-4370

Fax: (208) 769-3451

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

Recycling and Emissions Reductions

2.21 The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

Hospital / Medical / Infectious Waste Incinerators Constructed Before June 20, 1996

- 2.22 Any co-fired combustor is not subject to IDAPA 58.01.01.862 if the permittee does the following:
 - Notifies DEO of an exemption claim
 - Provides an estimate of the relative amounts of hospital waste, medical/infections waste, and other fuels and wastes to be combusted
 - Keeps records on a calendar-quarter basis of the weight of hospital waste, medical/infectious waste, and the weight of all other fuels and wastes combusted.

[IDAPA 58.01.01.862.02.b]

Permittee: Location: University of Idaho Moscow, Idaho Facility ID No. 057-00025

Date Issued: Date Expires: September 2, 2004 November 18, 2007

3. SOLID FUELS WOOD-WASTE-FIRED BOILER (S-B00)

3.1 Boiler Process Description

This permit condition is for information purposes only.

The primary purpose of the wood-waste-fired boiler is to produce steam for heating the campus during cold weather and to provide steam to absorption chillers to cool the campus buildings in summer. This boiler uses wood-waste as a fuel and is allowed to use confidential business paper as a fuel in an amount that is not to exceed 0.5% of the average volume of wood-waste fuel combusted at any time.

This emissions unit contains a furnace section and a boiler section. The furnace section combusts woodwaste to provide heat to the boiler section. The boiler section transfers a portion of this heat from the combustion gases to water flowing inside tubes located in the boiler section to create steam for various uses at the campus. Solid Fuels Inc. manufactured the furnace. The boiler section was manufactured by Nebraska, and is rated at 60,000 pounds of steam per hour.

3.2 Boiler Control Description

This permit condition is for information purposes only.

A multiclone controls emissions from the wood-waste-fired boiler. Emissions from the multiclone unit are then vented through a stack to the atmosphere.

Table 3.1 lists the emissions unit and emissions control device(s).

Table 3.1 EMISSION UNIT AND CONTROL DEVICES

| Emission Unit | Emission Control Device | |
|--|-------------------------|--|
| Solid Fuels wood-waste-fired boiler, Model S-B00 | Multiclone | |

Table 3.2 contains a summary of requirements that apply to the Solid Fuels wood-waste-fired boiler.

Table 3.2 APPLICABLE REQUIREMENTS SUMMARY

| Permit Conditions | Parameter | Permit Limit / Standard Summary | Applicable Requirements Reference | Monitoring and Recordkeeping Requirements |
|----------------------|-------------------|---|---|---|
| 3.3 | PM | 0.08 gr/dscf at 8% oxygen by volume | Tier II Operating Permit and PTC No. 057-00025 | 3.14, 3.16 |
| 3.3 | PM ₁₀ | 17.24 lb/hr, 75.52 T/yr | Tier II Operating Permit and PTC No. 057-00025 | 3.14, 3.16 |
| 3.3 | со | 164 T/yr | Tier II Operating Permit and PTC No. 057-00025 | 3.16 |
| 3.3 | NO _x | 71.63 T/yr | Tier II Operating Permit and PTC No. 057-00025 | 3.16 |
| 3.4 | Visible emissions | 20% opacity for no more than three minutes in any 60- minute period | Tier II Operating Permit and PTC No. 057-00025 | 3.10 |

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Emission Limits

3.3 Solid Fuels Wood-Waste-Fired Boiler Emission Limits

Particulate matter emissions from the wood-waste-fired boiler stack shall not exceed 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume (IDAPA 58.01.01.676), nor shall NO_x, PM₁₀, and CO emissions exceed any corresponding emission rate limit listed in Table 3.3.

Table 3.3 SOLID FUELS WOOD-WASTE-FIRED BOILER ALLOWABLE EMISSIONS

| | PM _{1*} | | CO . | NOx |
|---|------------------|-------|------|-------|
| Source | lb/br | T/yr | T/yr | Т/уг |
| Solid Fuels wood-waste-fired boiler (S-B00) | 17.24 | 75.52 | 164 | 71.63 |

Compliance shall be demonstrated with the hourly and annual emission limits.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

3.4 Boiler Visible Emission Limits

Visible emissions from the wood-waste-fired boiler stack shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required in IDAPA 58.01.01.625. This limitation shall apply whether only the wood-waste-fired boiler is operating, or if the wood-waste-fired boiler and the natural gas-fired boiler S-B1 are operating concurrently.

[IDAPA 58.01.01.625, 4/5/00]

OPERATING REQUIREMENTS

3.5 Boiler Operation Limit

3.5.1 The maximum steam production rate of the wood-waste-fired boiler shall not exceed an average of 52,300 pounds of steam per hour, based upon a three-hour rolling average.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

3.5.2 The maximum allowable steam production rate of 52,300 pounds of steam per hour may be increased to a level that shall not exceed 120% of the average steam production rate attained during the most recent performance test approved by DEQ.

Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/021

If the maximum steaming production rate of 120% of the average steam rate attained during the most recent performance test would exceed the PM grain-loading standard contained in this permit, the maximum operational steaming rate shall be limited to the steaming rate obtained by the following equation:

Max. steam rate = Ave. steam rate during test $x = \frac{0.08 \text{ gr/dscf at 8\% oxygen}}{\text{tested grain loading at 8\% oxygen}}$

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3.6 Multiclone Unit Operation and Maintenance Manual

- The permittee shall maintain an Operations and Maintenance (O&M) manual for the multiclone unit
 describing the schedule and steps taken to assure DEQ that the air pollution control equipment will
 be properly operated and maintained. The O&M manual shall address the operation, maintenance,
 and repair of the multiclone and shall include, at a minimum, the following:
- A general description of the multiclone control device
- Normal operating conditions, which shall include multiclone pressure drop ranges for the steam production range of the wood-waste-fired boiler
- Normal operating procedures
- Methods of preventing malfunctions
- Appropriate corrective actions to be taken in the case of upsets and malfunctions
- Provisions for weekly inspections and routine maintenance schedules

The O&M manual shall be updated periodically as additional information is gained from performance testing and day-to-day operating experience. This manual shall remain on site and shall be made available to DEQ representatives upon request.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

3.7 Pollution Control Equipment

Operation of the pollution control equipment (multiclone) shall be continuous at all times with the operation of the wood-waste-fired boiler.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

3.8 Multiclone Pressure Drop Monitoring

The permittee shall install, operate, and maintain a device to continuously monitor the pressure drop across the multiclone. The pressure drop shall be recorded once on a daily basis during operation of the wood-waste boiler. The multiclone pressure drop records shall be maintained on site for the most recent five-year period and shall be made available to DEO representative upon request.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

Upon modification or renewal of this Tier I operating permit, the specific operating range developed and listed in the O&M manual pursuant to Permit Condition 3.6 shall be incorporated into the modified or renewed permit as a federally enforceable permit condition.

[IDAPA 58.01.01.322.01, 3/19/99]

3.9 Boiler Fuel Requirements

The wood-waste boiler shall only use wood fuel and is allowed to burn confidential paper-derived fuel of up to 0.5% by volume of the total volume of solid fuel material combusted in the wood-waste boiler at any time. Compliance with this limitation shall be established on a rolling 12-month basis. The boiler shall not combust any contaminated wood fuels such as railroad ties, orientated strand board, particleboard, plywood, or painted or stained woods.

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Monitoring and Recordkeeping Requirements

3.10 Boiler Continuous Opacity Monitoring

The in-stack, continuous opacity monitoring system (COMS) shall be installed, operated, calibrated, and properly maintained on the boiler stack, in accordance with 40 CFR 60.7; 40 CFR 60.13; and 40 CFR 60, Appendix B, Specification 1, except as follows:

The COMS shall be operated in accordance with 40 CFR 60.7, except that files required by 40 CFR 60.7(f) shall be retained for at least five years following the date of measurement, maintenance, reports, or records.

Excess emissions reports shall be submitted to DEQ in accordance with the provisions of IDAPA 58.01.01.130-136.

The COMS shall be operated in accordance with 40 CFR 60.13, except the opacity data reduction specified by 40 CFR 60.13(h) shall be reduced to demonstrate compliance with the visible emissions limitation specified by IDAPA 58.01.01.625.

The reduced data shall be presented numerically, and may, at the permittee's option, be presented graphically. Periods of excess emissions, as defined by IDAPA 58.01.01.006.35, which result due to startup, shutdown, and scheduled maintenance, shall be clearly identified in the reduced visible emissions documentation.

For periods where the COMS downtime exceeds 5% of the total operating time for the reporting period, the permittee shall perform a see/no see evaluation on the wood-waste boiler stack once per day during periods where the wood-waste boiler is operating and the COMS is not operational. If visible emissions are noted, the permittee shall perform a Method 9 opacity determination in accordance with the procedures outlined in IDAPA 58.01.01.625 during the same day.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

3.11 Boiler Steam Rate Monitoring

The permittee shall monitor and record the hourly steam production rate of the wood-waste-fired boiler which is representative of individual one-hour periods. On a monthly basis, the permittee shall calculate the average hourly steam production rate using each individual hourly steam production value on the basis of a three-hour average. The average hourly steam production values shall be used to determine compliance with the hourly steam production limitation specified in Permit Condition 3.5 and the emission limitations. This information shall be maintained on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

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3.12 Boiler Compliance Testing

Within 12 months prior to or after the issuance date of this permit, the permittee shall conduct a compliance test on the wood-waste-fired boiler stack to demonstrate compliance with the grain-loading emission standard of 0.080 gr/dscf, corrected to 8% oxygen, as specified by IDAPA 58.01.01.677. Compliance testing shall be conducted in accordance with Permit Condition 2.20 and IDAPA 58.01.01.157.

Visible emissions shall be monitored concurrently with each compliance test run according to the provisions specified by IDAPA 58.01.01.625. The permittee may use the in-stack COMS and reduced data in lieu of EPA Reference Method 9 to establish the opacity during each test run.

The permittee shall also monitor and record the following information during each compliance test run: the steam production, the multiclone pressure drop, and the fuel-feed rate in a manner that allows the actual hourly heat input of the fuel to be determined.

The test shall be performed while combusting wood-waste.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

3.13 Frequency of Compliance Testing

If the particulate grain-loading concentration measured in the compliance test is less than or equal to 75% of the particulate grain-loading standard of 0.080 gr/dscf at 8% oxygen, no further testing is required for the five-year term of this permit. If the particulate grain-loading concentration measured during the compliance test is greater than 75%, but less than or equal to 90% of the particulate grain-loading standard of 0.080 gr/dscf at 8% oxygen, an additional test shall be required within 36 months of the previous test date. If the particulate grain-loading concentration measured during the compliance test is greater than 90% of the particulate grain-loading standard of 0.080 gr/dscf at 8% oxygen, the permittee shall conduct an additional performance test within 12 months of the previous test date.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

3.14 Multiclone Pressure Drop Monitoring

The permittee shall install, operate, and maintain a device to continuously monitor the pressure drop across the multiclone. The average pressure drop shall be recorded once daily during operation of the Solid Fuels wood-waste-fired boiler. The average shall be derived from no less than 12 readings, no less than 45 minutes apart. The multiclone pressure drop records shall be maintained on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

3.15 Confidential Paper-Derived Fuel Monitoring

The permittee shall monitor and record the volume of confidential paper-derived fuel on the days when paper-derived fuel is combusted in the wood-waste-fired boiler. The volume of wood-waste fuel combusted in the wood-waste-fired boiler shall be monitored and recorded in the same units as the paper-derived fuel. These values shall be used to establish compliance with Permit Condition 3.9. Records of this information shall be maintained on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

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3.16 Boiler Emission Limitation Compliance Demonstration

The permittee shall calculate hourly emissions using the emission factors in the following table on a monthly basis using the information required by Permit Condition 3.11.

Table 3.4 HOURLY AND ANNUAL EMISSIONS CALCULATIONS

| Pollutant | Steam Production (lb steam/hr) | Emission Factor | Emissions |
|------------------|-----------------------------------|--|---------------------------|
| PM ₁₀ | | 0.2395 lb PM ₁₀ / 1000 lb steam = | lbs PM ₁₀ / hr |
| ÇO | | 0.5200 lb CO / 1000 lb steam = | lbs CO / hr |
| NO _x | | 0.2271 lb NO _x / 1000 lb steam = | lbs NO _x / hr |

Compliance with the annual emission limitations for PM_{10} , CO, and NO_X in this permit shall be determined by summing the hourly steam production on a monthly basis and multiplying the monthly steam production by the emission factors listed in Table 3.4 above. The monthly emission rate values shall be summed for each consecutive 12-month period and shall be converted to an annual basis.

The permittee may use emission factors developed through DEQ-approved performance testing in place of the emission factors listed in Table 3.4, provided they are in the same units as the emission factors listed in Table 3.4 are formally approved by DEQ, and changed in this permit.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

Reporting Requirements

3.17 Opacity Records

The permittee shall maintain on file the continuously recorded in-stack opacity data from the wood-waste-fired boiler stack for the most recent five-year operating period and shall be made available to DEQ representatives upon request.

[IDAPA 58.01.01.322.08, 5/1/94]

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4. NATURAL GAS-FIRED BOILERS

S-B0 - CLEAVER-BROOKS BOILER S-B4 - COMBUSTION ENGINEERING BOILER

4.1 Process Description

This permit condition is for information purposes only.

In the event the solid fuels wood-waste-fired boiler is shut down or cannot supply the desired quantity of steam for the facility, one or more of the natural gas-fired boilers, identified as S-B0 and S-B4, is operated.

Table 4.1 lists the emissions control devices for the natural gas-fired boilers.

Table 4.1 EMISSION UNIT AND CONTROL DEVICES

| Emission Unit | Emission Control Device | |
|---|-------------------------|--|
| Cleaver-Brooks boiler, Model S-B0 | None | |
| Combustion Engineering boiler, Model S-B4 | None | |

Table 4.2 contains a summary of requirements that apply to the natural gas-fired boilers.

Table 4.2 APPLICABLE REQUIREMENTS SUMMARY

| Permit Condition | Parameter | Permit Limit / Standard Summary | Applicable Requirements Reference | Monitoring and Recordkeeping Requirements |
|---------------------|-------------------|---|---|---|
| 4.2 | РМ | 0.015 gr/dscf at 3% oxygen by volume | Tier II Operating Permit and PTC No. 057-00025 | 4.4 |
| 4.3 | Visible emissions | 20% opacity for no more than three minutes in any 60-minute period. | Tier II Operating Permit and PTC No. 057-00025 | 4.5 |

Emissions Limits

4.2 Grain-Loading Standard

Particulate matter emissions from each of the natural gas-fired boiler stacks shall not exceed 0.015 gr/dscf of effluent gas adjusted to 3% oxygen by volume (IDAPA 58.01.01.676).

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

4.3 Visible Emissions Limits

Visible emissions from any natural gas-fired boiler stack shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required in IDAPA 58.01.01.625.

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MONITORING AND RECORDKEEPING REQUIREMENTS

4.4 IDAPA 58.01.01.677 Grain-loading Standard Compliance

This permit requires no compliance demonstration for the natural gas-fired boilers designated as S-B0 or S-B4 for the purpose of establishing compliance with the grain-loading standard per IDAPA 58.01.01.677.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

4.5 Visible Emissions Limits Compliance

No compliance demonstration is required by this permit for the natural gas-fired boilers designated as S-B0 or S-B4 for the purpose of establishing compliance with the visible emissions standard per IDAPA 58.01.01.625, except as required by Permit Condition 2.7.

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5. DIESEL-FIRED EMERGENCY ELECTRICAL GENERATORS (S-G01, S-G02, S-G03)

5.1 Generator Process Description

This permit condition is for information purposes only.

In the event of disruption of electricity to the facility from the power grid, one or more of the emergency electrical generator engines identified as S-G01, S-G02, and S-G03 is started and operated to provide mechanical power to the generator unit connected to each engine. Electricity is provided to sites within the facility. The generator engines are typically operated periodically for short duration for maintenance and emergency readiness purposes.

Table 5.1 lists the emissions control devices for the diesel-fired electrical generators.

Table 5.1 EMISSION UNITS AND EMISSIONS CONTROL DEVICES

| Emission Unit | Emission Control Device | | | |
|--|-------------------------|--|--|--|
| S-G01 Diesel-fired emergency generator | None | | | |
| S-G02 Diesel-fired emergency generator | None | | | |
| S-G03 Diesel-fired emergency generator | None | | | |

Table 5.2 contains a summary of requirements that apply to the diesel-fired electrical generators.

Table 5.2 APPLICABLE REQUIREMENTS SUMMARY

| Permit Conditions | Parameter | Permit Limit / Standard Summary | Applicable Requirements Reference | Monitoring and Recordkeeping Requirements |
|----------------------|-------------------|---|--------------------------------------|---|
| 5.3 | Visible emissions | 20% opacity for no more than three minutes in any 60-minute period. | Tier II Permit No. 057-00025 | 5.4 |

Emissions Limits

5.2 Generator Engines Visible Emissions Limits

Visible emissions from any of the diesel-fired generator engine stacks shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required in IDAPA 58.01.01.625.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

Operating Requirements

5.3 Generator Engines Operation Limit

Each of the diesel-fired generator engines shall operate no more than 1,800 hours in any consecutive 12-month period.

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Monitoring and Recordkeeping Requirement

5.4 Diesel-fired Generator Engines Parameter Monitoring

The permittee shall monitor and record the total hours of operation for each individual generator engine listed in this permit condition on a monthly basis. The monthly operating hours for each generator engine shall be summed for each consecutive 12-month period to establish compliance with the operation limitation specified by Permit Condition 5.3.

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6. INSIGNIFICANT ACTIVITIES

Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b)(i) are listed in the Tier I operating permit to qualify for a permit shield.

Table 6.1 INSIGNIFICANT ACTIVITIES

| Description | Insignificant Activities IDAPA 58.01.01.317.01(b)(I) Citation |
|--|---|
| Storage tanks less than 260 gallons storage capacity | 1 |
| Storage tanks containing VOC products less than 10,000 gallons storage capacity | 3 |
| Natural gas-fired emergency generators less than 5 MMBtu/hr heat input | . 5 |
| Gasoline-fired emergency generator of less than 0.5 MMBtu/hr and fuel less than 1.0 weight percent sulfur | 6 |
| Biofuels test engines of less than 0.5 MMBtu/hr and fuel less than 1.0 weight percent sulfur | 6 |
| Small emergency generators | 7 |
| Printing and silk-screening activities | 12 |
| Water chlorination facilities less than 20 MMGal/day | 16 |
| Paint booths less than 2 gallons per day | 17 |
| Small boilers less than 5MMBtu/hr | 18 |
| Domestic hot water heaters less than 5 MMBtu/hr | 18 |
| Small space heating furnaces less than 5 MMBtu/hr | 18 |
| Smokehouses under 20 square feet | 21 |
| Treated wastewater effluent chlorination facility less than 1 MMGal/day | 28 |
| Incinerators | 30 |
| Indoor firing range | 30 |
| Gas storage area and gas cabinets | 30 |
| Indoor swimming pool | 30 |
| Space heating boiler - Holm Research Center | 30 |
| Space heating boiler - Dairy milk parlor/barn | 30 |
| Space heating boiler - Martin Lab | 30 |
| Space heating boiler - Aquaculture Institute | 30 |
| Space heating boiler - Kibbie Dome | 30 |
| Space heating boiler - President's residence | 30 |
| Space heating boiler - Kibbie east end addition | 30 |
| Space heating boiler - Dairy milk parlor /barn | . 30 |
| Space heating boiler - Campus police station | 30 |
| Space heating boiler - Targhee Hall | 30 |
| Space heating furnace - Holm Research Center - 3 | 30 |
| Space heating furnace - Holm Research Canter - 4 | 30 |
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| Description | Insignificant Activities IDAPA 58.01.01.317.01(b)(I) Citation |
|---|---|
| Space heating furnace - U of I Foundation Office | 30 |
| Space heating furnace - Meat lab/pavilion - 2 | 30 |
| Space heating furnace - Targhee Hall | 30 |
| Space heating furnace - Business tech incubator | 30 |
| Space heating furnace - North Campus Center - 4 | 30 |
| Space heating furnace - Human Resources | 30 |
| Space heating furnace - Industrial Education - 2 | 30 |
| Space heating furnace - North Campus Center - 1 | 30 |
| Space heating furnace - Motor pool/garage -2 | 30 |
| Space heating furnace - Industrial Education - 7 | 30 |
| Space heating furnace - Golf course club house | 30 |
| Space heating furnace - Meat lab/pavilion - 1 | 30 |
| Space heating furnace - Industrial Education - 5 | 30 |
| Space heating furnace - North Campus Center - 3 | 30 |
| Space heating furnace - Golf course club house | 30 |
| Space heating furnace - Industrial Education - 4 | 30 |
| Space heating furnace - Ag publications | 30 |
| Space heating furnace - Motor pool/garage - 3 | 30 |
| Space heating furnace - Ag Engineering Office | 30 |
| Space heating furnace - Bookstore - 3 | 30 |
| Space heating furnace - Aquaculture Lab - 2 | 30 |
| Space heating furnace - Hemo-Parasitic barn | 30 |
| Space heating furnace - North Campus Center - 3 | 30 |
| Space heating furnace - Motor pool/garage - 4 (8 Units) | 30 |
| Space heating furnace - Sheep house | 30 |
| Space heating furnace - Family housing -2 (7 Units) | 30 |
| Space heating furnace - Business Tech incubator | 30 |
| Space heating furnace - Industrial Education - 3 | 30 |
| Space heating furnace - Bookstore - 2 | 30 |
| Space heating furnace - North Campus Center - 5 | 30 |
| Space heating furnace – Family housing – 3 | 30 |
| Space heating furnace - Dairy house | 30 |
| Space heating furnace - Beef house | 30 |
| Space heating furnace - Business Tech incubator (9 Units) | 30 |
| Space heating furnace - Bookstore - 1 | 30 |
| Space heating furnace - Family housing group (108 Units) | 30 |
| Space heating furnace - Motor pool/garage -1 | 30 |

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| Description | Insignificant Activities IDAPA 58.01.01.317.01(b)(I) Citation | | |
|--|---|--|--|
| Space heating furnace - Domestic water system pump house | 30 | | |
| Space heating furnace - Aquaculture Lab - 1 | 30 | | |
| Space heating furnace - Industrial Education -1 | 30 | | |
| Water heater - Kibbie east end addition | 30 | | |
| Water heater - Holm Research | 30 | | |
| Water heater - Meats Lab - i | 30 | | |
| Water heater - Meats Lab - 2 | 30 | | |
| Water heater - Targhee Hall | 30 | | |
| Water heater - Martin Lab | 30 | | |
| Water heater - Dairy milking parlor | 30 | | |
| Water heater - President's residence | 30 | | |
| Water heater - Family housing (108 Units) | 30 | | |
| Incinerator burners - Life Science North | 30 | | |
| Incinerator burners - Holm Research | 30 | | |
| Emergency generator - College of Forestry | 30 | | |
| Emergency generator – Library | 30 | | |
| Emergency generator - Kibbie Dome | 30 | | |
| Emergency generator - Theophilus Tower | 30 | | |
| Emergency generator Administration | 30 | | |
| Emergency generator McConnell Hall | 30 | | |
| Emergency generator Student Union Building | 30 | | |
| Emergency generator - Engineering/Physics | 30 | | |
| Biofuels test engines - Engineering Isotopes Lab (3 Engines) | 30 | | |

There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the facility-wide permit conditions.

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7. TIER I OPERATING PERMIT GENERAL PROVISIONS

General Compliance

The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a
violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or
revision; or for denial of a permit renewal application.

[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]

- 2. It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.

 [IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]
- Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a
 permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit
 such supplementary facts or corrected information.

[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

Reopening

4. This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.

[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1) and (2); 40 CFR 70.6(a)(6)(iii)]

5. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

Property Rights

6. This permit does not convey any property rights of any sort, or any exclusive privilege.

[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

Information Requests

7. The permittee shall furnish all information requested by DEQ, within a reasonable time, that DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

[Idaho Code §39-108; IDAPA 58.01.01.122, 5/1/94; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]

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8. Upon request, the permittee shall furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Severability

9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

10. The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/5/00; IDAPA 58.01.01.322.15.i and 380-386, 3/19/99; 40 CFR 70.4(b)(12), (14) and (15); 40 CFR 70.7(d) and (e)]

11. Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. Clean Air Act section 502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 3/19/99; IDAPA 58.01.01.209.05, 5/1/94; 40 CFR 70.4(b)(14) and (15)]

Federal and State Enforceability

12. Unless specifically identified as a "state-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) by DEQ in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1) and (2)]

13. Provisions specifically identified as a "state-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

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Inspection and Entry

14. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- 14.1 Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
- 14.2 Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- 14.3 Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- 14.4 As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.i, 3/19/99; 40 CFR 70.6(c)(2)]

New Requirements During Permit Term

15. The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8]

Registration and Registration Fees

16. The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387, 4/2/03]

Certification

17. All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewai

18.1 The owner or operator of a Tier I source shall submit an application to DEQ for a renewal of this permit at least 6 months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application 9 months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

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18.2 If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

Permit Shield

- 19. Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
- Such applicable requirements are included and are specifically identified in the Tier I operating permit;
 or
- DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- 19.2 The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- 19.3 Nothing in this permit shall alter or affect the following:
- 19.3.1 Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
- 19.3.2 The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- 19.3.3 The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
- 19.3.4 The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[idaho Code §39-108 and 112; IDAPA 58.01.01.122, 322.15.m, and 325, 5/1/94; IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, and 385.03, 3/19/99; 40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

- 20.1 For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- 20.2 For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- 20.3 For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.

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20.4 For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9 and 10, 5/1/94; 40 CFR 70.6(c)(3) and (4)]

Periodic Compliance Certification

- 21. The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as follows:
- The permittee's reporting period for annual compliance certifications for all emissions units shall be from October 16 to October 15 of each year. The compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA within 30 days of the end of the specified reporting period.
- The compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
- 21.3 The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
- 21.3.1 The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
- 21.3.2 The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit.
- 21.3.3 The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Paragraph 21.3.2 above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR 64 occurred;
- 21.3.4 Such other facts as DEQ may require to determine the compliance status of the source.

[IDAPA 58.01.01.322.11, 2/5/04T; 40 CFR 70.6(c)(5)(iii) as amended; 62 Fed. Reg. 54900 and 54946, 10/22/97; 40 CFR 70.6(c)(5)(iv)]

False Statements

22. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

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No Tampering

23. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Semiannual Monitoring Reports

24. In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months. The permittee's semiannual reporting periods shall be from April 16 to October 15 and October 16 to April 15. All instances of deviations from this operating permit's requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 30 days of the end of the specified reporting period.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Reporting Deviations and Excess Emissions

The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit. [IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

Emergency

27. In accordance with IDAPA 58.01.01.332, an "emergency" as defined in IDAPA 58.01.01.008., constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]

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University of Idaho

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APPENDIX

AIR EMISSIONS INVENTORY

The following tables represent the potential to emit for criteria air pollutants for the University of Idaho facility. The tables are for informational purposes only.

| Significant Sources | PM | | PM _{1#} | | SO ₂ | | CO | | NOx | | VOC | |
|---|-------|-------|------------------|-------|-----------------|------|-------|--------|-------|--------|-------|-------|
| | lb/hr | T/yr | lb/hr | T/yr | lb/hr | T/yr | ìb/br | T/yr | lb/hr | Т/уг | lb/br | T/yr |
| Solid Fuels wood-waste fired boiler (S-B00) | 13.79 | 60.42 | 17.24 | 75.52 | 0.82 | 3.58 | 37.44 | 163.99 | 16.35 | 71.63 | 2.40 | 10.51 |
| Cleaver-Brooks natural gas- fired boiler (S-B0) | 0.61 | 2.69 | 0.61 | 2.69 | 0.05 | 0.22 | 6.79 | 29.8 | 8.09 | 35.43 | 0.44 | 1.95 |
| Combustion Engineering natural gas-fired boiler (S- B4) | 0.32 | 1.40 | 0.32 | 1.40 | 0.03 | 0.13 | 3.53 | 15.5 | 4.21 | 18.42 | 0.23 | 1.01 |
| Electrical generator engine SG-01, Gibb Hall | 1.15 | 1.03 | 1.15 | 1.03 | 1.07 | 0.97 | 3.52 | 3.16 | 16.32 | 14.69 | 1.33 | 1.20 |
| Electrical generator engine SG-02, Power Plant | 1.02 | 0.92 | 1.02 | 0.92 | 0.96 | 0.86 | 3.14 | 2.82 | 14.55 | 13.10 | 1.19 | 1.07 |
| Electrical generator Engine SG-03, McClure Hall | 1.46 | 1.31 | 1.46 | 1.31 | 1.36 | 1.23 | 4.47 | 4.02 | 20.73 | 18.66 | 1.69 | 1.52 |
| Total | 18.94 | 67.86 | 22.39 | 82.87 | 4.34 | 6.99 | 65.36 | 219.49 | 87.96 | 171.93 | 7.70 | 17.26 |

EMISSION TOTALS FOR OTHER SOURCES (T/yr)

| NO _X | SO ₂ | PM/PM _{1e} | CO | VOC |
|-----------------|-----------------|---------------------|--------|------|
| 21.59 | 0.17 | 1.38 | -11.78 | 2.49 |

FACILITY-WIDE ANNUAL POTENTIAL EMISSIONS SUMMARY (T/yr)

| PM | PM ₁₀ | SO ₂ | CO | $NO_{\mathbf{x}}$ | VOC |
|-------|------------------|-----------------|--------|-------------------|-------|
| 69.24 | 84.25 | 7.16 | 231.27 | 193.52 | 19.85 |

[Tier II Permit No. 057-00025, 9/10/02]